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September 2, 2008

### BY ELECTRONIC MAIL

The Honorable Paul A. Crotty  
United States District Court  
Southern District of New York  
500 Pearl Street, Chambers 735  
New York, New York 10007

*Re: request is denied*

*SO ORDERED:* SEP 03 2008

*Paul A. Crotty*  
HON. PAULA A. CROTTY

Re: Aruba Hotel Enterprises, N.V. v. Belfonti, et al  
No. 07 CV 07564 (PAC) UNITED STATES DISTRICT JUDGE

Dear Judge Crotty:

We write on behalf of Defendants Michael Belfonti, Belfonti Holdings LLC, and Belfonti Capital Partners, LLC to request a pre-motion conference in anticipation of filing a motion (on consent of all parties) to seek an additional ten pages to respond to AHE's Motion for Summary Judgment and to address the issues raised by the Court's order of August 29, 2008.

By way of background, Plaintiff AHE filed its motion for summary judgment on July 25, 2008. Defendants' opposition papers are due on September 5, 2008. Pursuant to Rule 3(G) of Your Honor's Individual Practices, Defendant's opposition brief is limited to twenty-five (25) pages. Ordinarily, this would be sufficient for Defendants to set forth their position as to why AHE's motion should be denied. However, on August 22, 2008, Defendants requested a conference with the Court in anticipation of filing separate motions regarding issues that have recently arisen regarding AHE's claims of irreparable harm. On August 29, 2008, the Court ordered that (in lieu of a separate motion), the Defendants could include the offered materials in their response to Plaintiff's request for summary judgment.

In order for Defendants to properly set forth their position on AHE's request for summary judgment and to seek appropriate relief regarding the significant issues raised by AHE's recent disclosure, a further ten (10) pages of briefing is needed. I have spoken to counsel for AHE and he consents to our request for additional pages. Defendants likewise consent to AHE's request for a reasonable extension of its reply brief.

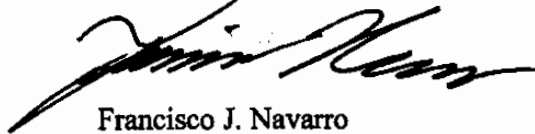
MEMO ENDORSED

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The Honorable Paul A. Crotty  
September 2, 2008  
Page 2

Accordingly, Defendants respectfully request a pre-motion conference so that they can pursue their motion for ten extra pages of briefing, or in the alternative, an order granting Defendant's request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Francisco J. Navarro", written in a cursive style.

Francisco J. Navarro

cc: Michael T. Mervis, Esq.